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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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AMERICAN FEDERATION OF

GOVERNMENT EMPLOYEES, LOCAL 3369, : 23 Civ. 3595 (JHR)

Plaintiff, : NOTICE OF MOTION

- against -

UNITED STATES SOCIAL SECURITY :

ADMINISTRATION,

:

Defendant.

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PLEASE TAKE NOTICE that upon the amended complaint, defendants' memorandum of law, the Declaration of Michelle Christ and exhibits thereto, and all other pleadings and proceedings in this action, defendant United States Social Security Administration will move this Court before the Honorable Jennifer H. Reardon, United States District Judge, United States Courthouse, Courtroom 12 B, 500 Pearl Street, New York, New York 10007, for dismissal, or, in the alternative, for summary judgment pursuant to Rules 12(b)(6) and 56, respectively, of the Federal Rules of Civil Procedure, and for such other relief as is just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1(b) of this Court, plaintiff's opposition to defendant's motion shall be served and filed within two weeks.

Dated: New York, New York

August 29, 2023

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney for the Southern District of New York Attorney for Defendants

/s/ Joseph A. Pantoja

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